

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

PAULA BAILEY, KRYSTAL CLARK
and HOPE ZENTZ, on behalf of
themselves and others similarly
situated

Plaintiffs,

v.

No. 2:19-cv-13442

HON. VICTORIA A. ROBERTS

MAG. ELIZABETH A. STAFFORD

HEIDI WASHINGTON, JEREMY
HOWARD, SHAWN BREWER,
KENNETH MCKEE, JEREMY BUSH,
LIA GULICK, ED VALLAD, DAVID
JOHNSON, KARRI OSTERHOUT,
JOSEPH TREPPA, DAN CARTER,
RICHARD BULLARD and TONI
MOORE, in their individual and
official capacity,

Defendants.

**DEFENDANTS' DEMAND FOR
JURY TRIAL**

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MDOC DEFENDANTS' DEMAND FOR JURY TRIAL

MDOC Defendants Ed Vallad, Jeremy Bush, Toni Moore and
Jeremy Howard in addition to Shawn Brewer, Richard Bullard, Dan
Carter, Lia Gulick, David Johnson, Kenneth Mckee, Karri Osterhout,
Joseph Treppa and Heidi Washington, through undersigned counsel,
under Fed. R. Civ. P. 38(b), demand a trial by jury in the above-

captioned matter.

Respectfully submitted,

Dana Nessel
Attorney General

/s/ John L. Thurber
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Dated: April 23, 2021

CERTIFICATE OF SERVICE (E-FILE)

I hereby certify that on April 23, 2021, I electronically filed *the foregoing document* together with this *Certificate of Service* with the Clerk of the Court using the ECF System, which will provide electronic copies to parties of record.

/s/ John L. Thurber
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